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February 27, 2018
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Norstan Communications, Inc. d/b/a Black Box Network Services – 499 Filer ID 827433
CY 2017 Annual CPNI Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Norstan Communications, Inc. d/b/a Black Box Network Services.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to dgale@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Don Gale

Don Gale
Consultant

cc: J. Cassibo – Black Box (via Email)
tms: FCx1801

Enclosures
DG/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36
Attachment A**

Statement in Support of Certification for Calendar Year 2017

Norstan Communications, Inc. d/b/a Black Box Network Services

Norstan Communications, Inc. d/b/a Black Box Network Services (hereinafter referred to as the "Company") resells Voice over Internet Protocol ("VoIP") – related services (the "Services"). The Company does not market the Services to end users using CPNI in any fashion. The Company has not used or disclosed CPNI for any sales or marketing-related purpose or activities and the Company has not permitted any third parties to do so.

To the extent the Company has access to CPNI, including billed call detail, this information is accessible only to employees authorized by senior management, such as the Company's accounting/billing and accounts receivable/collection teams, which have access to such information only in connection with their respective functions. These employees have been trained that they are only permitted to use CPNI in connection with these permissible functions, and not for marketing purposes. The Company's Code of Ethics requires each employee to comply strictly with all federal, state and local laws and all foreign laws that apply to the activities of the Company, and, accordingly, prohibits the unauthorized use of CPNI. Violation of this Code of Ethics may subject the employee to discipline up to and including termination of employment.

The Company's VoIP customers do not have access to their account information via an online system. The Company does not have any retail locations and therefore does not disclose CPNI in-store.

The Company's services are billed directly by the Company and all customer service inquiries are handled by the Company. Disclosure of call detail information to customers over the telephone is only provided if the caller has the bill and can direct questions to customer service by providing specific call detail about which there are questions and, therefore, falls within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer issue.

With the exception of such customer service inquiries, the Company does not use CPNI for any marketing purpose for which customer approval is required. Should the Company expand its business in the future to include the marketing of services that involve the use of CPNI, it will follow the applicable rules set forth in 47 C.F.R. Subpart U for the use of CPNI in connection with such marketing activities.

Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided. The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

The Company has not taken any actions against data brokers in the last year. The Company did not receive any customer complaints about the unauthorized release of CPNI in the calendar year 2017.